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21 **Attorneys for Defendant**
22 **CONSTELLATION WINES U.S., INC.**

23 **UNITED STATES DISTRICT COURT**
24 **NORTHERN DISTRICT OF CALIFORNIA**

25 **UNITED STATES EQUAL EMPLOYMENT**
26 **OPPORTUNITY COMMISSION,**

27 **Plaintiff,**

28 **v.**

CONSTELLATION WINES U.S., INC.
dba DUNNEWOOD VINEYARDS,

Defendant.

CASE NO. CV 11-04437 JSW

JOINT MOTION TO MODIFY
SCHEDULING ORDER;
DECLARATION; ~~PROPOSED~~ ORDER

Oral Argument Not Requested

Plaintiff UNITED STATES EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
(hereinafter "Commission" or "EEOC") and Defendant CONSTELLATION WINES U.S., INC dba
DUNNEWOOD VINEYARDS (hereinafter "Constellation"), through their respective counsel, hereby
jointly move for a modification of the Court's January 30, 2012 Order Scheduling Trial and Pretrial
Matters [Dkt. No. 24].

With the exception of a stipulation for additional time to conduct discovery prior to the Court

1 appointed ADR process, there has not been a prior modification of the Court's Scheduling Order in this
 2 case. As detailed in the accompanying Declaration, very good cause exists to grant the modification of
 3 the current Scheduling order.

4
 5 On behalf of Plaintiff U.S. EEOC

On behalf of Defendant Constellation Wines U.S.,
 Inc. dba Dunnewood Vineyards

6 Dated: July 10, 2012

Dated: July 10, 2012

7 U. S. EQUAL EMPLOYMENT
 8 OPPORTUNITY COMMISSION

KAUFMAN DOLOWICH VOLUCK &
 GONZO LLP

9 /s/ William R. Tamayo
 William R. Tamayo, Regional Attorney

/s/ Elizabeth Williams
 Elizabeth Williams
 Attorney for Defendant

10 /s/ Jonathan T. Peck
 Jonathan T. Peck, Supervisory Trial Attorney

11 /s/ Raymond T. Cheung
 Raymond T. Cheung, Senior Trial Attorney
 Attorneys for Plaintiff U.S. EEOC

14 GENERAL ORDER 45 ATTESTATION

15 I, Raymond T. Cheung, am the ECF User whose ID and password are being used to file this
 16 Joint Motion to Modify Scheduling Order and [Proposed] Order. In compliance with General Order 45,
 17 X.B., I hereby attest that Elizabeth Williams has concurred in this filing.

18 Date: July 10, 2012

By: /s/ Raymond T. Cheung
 RAYMOND T. CHEUNG

21 ///
 22 ///
 23 ///

~~[Proposed]~~ ORDER

GOOD CAUSE APPEARING THEREFORE, the Court's January 30, 2012 Scheduling Order is hereby modified as follows:

<u>Current Deadlines</u>	<u>New Deadlines</u>
Jury Trial Date: 3/11/2013	4/1/2013
Pretrial Conference: 2/11/2013	3/4/2013
Last Day to Hear Dispositive Motions: 12/7/2012	1/25/2013
Last Day for Expert Discovery: 11/7/2012	12/26/2012
Close of Non-expert Discovery: 10/8/2012	11/26/2012
Further Case Management Conference: 10/12/2012	11/23/2012 12/7/12
Joint Supplemental Case Management Statement due: 10/5/2012	11/16/2012 11/30/12

IT IS SO ORDERED.

Dated: July 11, 2012


 HON. Jeffrey S. White
 United States District Court Judge